VI. If you are aware that SWBT-K is currently providing the elements described in L. 1-12 above to other companies, please provide company names.

Response: Brooks has no knowledge regarding whether SWBT is currently providing such items to other companies in Kansas.

VII. If the answer to question III is NO; Has your company announced plans or determined when you will offer these services?

Response: Brooks anticipates an initial offering of a limited number of services -- through resale of SWBT services -- by April, 1997, and anticipates expansion to a broader array of services within several months thereafter.

VIII. Are you currently expanding or constructing your own facilities? If so, please describe and when will these projects be completed?

Response: Brooks is constructing two connecting fiber optic rings in downtown Kansas City, Missouri, and a 52 route mile outer fiber optic ring which extends across the state boundary. Approximately 20 miles of this outer ring will be located in Kansas. Brooks will also collocate in a number of SWBT central offices, primarily through physical collocation, on both sides of the state boundary. Brooks is deploying a Lucent 5ESS digital switch as a host switch for its Kansas City network, and will be deploying remote switches in a number of the physical collocations. Brooks expects the collocations to begin to become operational within over the next several months. The downtown Kansas City, Missouri rings are expected to be completed in the very near future. The host switch is expected to be operational within several months, and the entire network is expected to be fully operational by approximately mid-1997. Brooks expects to provide service primarily by leasing SWBT unbundled loops and connecting them to Brooks' network.

IX. Does your company have a Franchise Agreement to operate in any of the cities in which you are serving or wish to serve?

Response: Yes, Brooks has a franchise in Leawood. Additionally, Brooks currently has permits allowing for initial installation of facilities in the following Kansas cities: Overland Park, Lenexa, Merriam, Prairie Village, Olathe, Mission, Roeland Park, Fairway, Westwood, Westwood Hills, and Mission Woods.

ATTACHMENT 4

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

APPLICATION OF ERNEST G. JOHNSON, DIRECTOR OF THE PUBLIC UTILITY DIVISION, OKLAHOMA CORPORATION COMMISSION TO EXPLORE THE REQUIREMENTS OF SECTION 271 OF THE TELECOMMUNCATIONS ACT OF 1996	) CAUSE PUD NO.) 970000064))))

TRANSCRIPT OF PROCEEDINGS

APRIL 23, 1997

OFFICIAL REPORTER:

LYNETTE H. WRANY, C.S.R.

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have out here where very, very big issues are decided by this Commission without one wit of evidence.

The point about - - that Mr. Moon makes that everything on the checklist has to be actually provided, that is not right. It has to be made available. If you just look at the dictionary, you will see that provided means made available. And the simple example that shows why that has to be the case, let's say there are ten big competitors, local competitors in Oklahoma, and they take 95 percent of our business away. Well, what if not one of them asks for one of the checklist items. Not a one of them asks for White Page listings. They would then be able to come in here and say, no, you know, we have eviscerated their business, but they aren't actually providing that White Page listing, so they're out of luck. I mean, that is where that argument takes you.

Collocation. I appreciate Mr. Cadieux's remarks. And I don't mind him testifying about it. I asked our folks to give me a summary of where we are, and it is pretty much what he said, that there has been problems on both sides. We feel that Brooks has changed its requirements on nearly every order. They have withdrawn some orders because of changes. Our experience with Brooks, frankly, has highlighted some shortcomings in our process. We have held meetings with collocation customers to try to

streamline the procedures, and we are revising our guidelines.

One of the problems is getting materials from vendors. We are working with the vendors to try to get these cage materials and other things delivered on a faster time. I think that - - I have seen the schedule now and we have got collocation cages being completed every week. And I think the problems are behind us on that. But your Staff, like I say, has already scheduled a visit on that.

Operational Support Systems. Comments have been made that some of these things aren't available until July and somehow we haven't met the checklist. Well, that is wrong. Under the Federal Act what we have to provide now, immediately, is what we provide to ourself in providing service. And those are being provided now. What AT&T is talking about are things that go beyond what we are providing now. And they're entitled to request those. And they're required to be provided when they're technically feasible. But this EDI example that they make is not something we provide ourself, it is something new, and there is no requirement under the Act that it be made available immediately.

The gas through the pipeline argument. That has been a recurrent theme of Joel Kline. It was a theme he made before the Congress passed the Act. Those kinds of

ATTACHMENT 5

BROOKS FIBER PROPERTIES

April 9, 1997

Wauneta Browne
Regulatory Manager
AT&T Communications of the Southwest, Inc.
1100 Walnut, Room 624
Kansas City, Missouri 64105

Re: AT&T Requests for Information - Oklahoma Cause No. PUD 970000064

Dear Ms. Browne

Enclosed please find Brooks Fiber Communications' Responses to AT&T's Requests for Information Nos. 1.1 through 1.5 in the above-referenced Cause. As requested, I have today faxed a copy of these responses to Kathleen LaValle.

If you have any questions concerning this matter, please call me at (314) 579-4637.

Very truly yours,

Edward J. Cadieux

Edward J. Cadieux

cc: J. Fred Gisl

Brooks Fiber Communications
Response to AT&T RFI No. 1.1

1.1 Please describe Brooks' experience to date with Interim Number Portability (INP) in Oklahoma with Southwestern Bell Telephone Company (SWBT).

A: Brooks' experience has been that for virtually every customer (approximately 12) for whom Brooks has activated service using INP, Brooks has experienced a problem. In these instances a gap (generally ranging from 30 minutes to several hours) has occurred where the customer has not received incoming calls. Brooks has been investigating this problem from the outset, and it is our assessment that what is occurring is that Brooks' orders for service using INP are separated into two distinct tasks within SWBT's administrative processing – one disconnecting SWBT service to the customer on the existing telephone number, and a second activating call forwarding from the pre-existing number to a number resident in the Brooks switch. Based on our contacts with SWBT regarding these service activations, it appears that SWBT is not coordinating the timing of these two steps in a manner such that they occur simultaneously and seamlessly to the end-user. In at least two instances Brooks had requested that SWBT postpone service cut-over, but SWBT implemented INP pursuant the original order, thus causing outages for several hours.

Because Brooks has only recently entered the local exchange market in Oklahoma, our experience with SWBT with INP implementation is necessarily limited, and it does appear that the gap between SWBT disconnection and implementation of INP is narrowing for more recent service activations. Because of the problems we have encountered, Brooks personnel have had to adopt a process of monitoring SWBT's INP implementation very closely -- virtually as it occurs -- in order to reduce the potential for service outages, and we will continue to take that approach until we gain a greater level of confidence in SWBT's implementation. Brooks has a couple of pending orders for service using INP for customers with large quantities of numbers, and we will be watching closely to see how that implementation occurs.

Brooks Fiber Communications
Response to AT&T RFI No. 1.2

1.2 Please describe the types of INP methods that Brooks is employing such as Remote Call Forwarding (RCF) or Direct Inward Dialing (DID).

A: To date, Brooks has utilized RCF only for INP in Oklahoma.

Brooks Fiber Communications
Response to AT&T RFI No. 1.3

1.3 Please describe any calling feature impacts that Brooks' customers have experienced as a result of employing INP with SWBT. Are these impacts in any way jeopardizing Brooks' ability to retain these new customers?

A: To date and to its knowledge, Brooks has not experienced any calling feature impacts associated with INP from SWBT. It should be noted, however, that the only calling feature which Brooks has to date activated for a customer using INP is Caller ID, and Brooks therefore has no current basis for evaluating any potential INP impacts for any other calling feature.

Brooks Fiber Communications
Response to AT&T RFI No. 1.4

1.4 Please provide the quantity of numbers Brooks has ported to date with SWBT.

A: To date Brooks has ported approximately 40 numbers (approximately 12 customers), although a couple of customer orders with large quantities of numbers have been submitted to SWBT for processing.

Brooks Fiber Communications
Response to AT&T RFI No. 1.5

1.5 Please provide copies of all responses to RFI's served by you or other parties in connection with Cause No. PUD 970000064.

A: Brooks has not issued any RFIs in this Cause, and has not received any RFIs from any Party other than AT&T in this Cause.

STATE OF MISSOURI)
) SS.
COUNTY OF ST. LOUIS)

VERIFICATION

I, EDWARD J. CADIEUX, first being duly sworn, states on my oath that I am the Director, Regulatory Affairs - Central Region of Brooks Fiber Properties, Inc. (BFP). I am authorized to act on behalf of Brooks Fiber Communications of Tulsa , Inc., and Brooks Fiber Communications of Oklahoma, Inc., (both wholly-owned subsidiaries of BFP) by providing the foregoing responses to AT&T's Requests for Information Nos. 1.1 through 1.5. I have read the aforesaid responses and I am informed and believe that the matters contained therein are true and correct to the best of my knowledge.

Dated: April 9, 1997

Edward J. Cadieux

EDWARD J. CADIEUX

EDWARD J. CADIEUX appeared, and being first duly sworn upon his oath stated that he is the Director, Regulatory Affairs - Central Region of Brooks Fiber Properties, Inc. (BFP) and that he signed the foregoing document as Director, Regulatory Affairs - Central Region of Brooks Fiber Properties, Inc., and the facts contained therein are true and correct according to the best of his knowledge.

IN WITNESS WHEREOF, I have set my hand and affixed my official seal in the aforesaid County and State on the above date.

Dated: April 9, 1997

S E Cundiff - Kennicke

NOTARY PUBLIC

My Appointment Expires: Oct 11, 1999

ATTACHMENT 6

Profile 1

Local Usage Profile

Local Usage (Originating and Terminating)	1400 MOU
Terminating to Originating Ratio	1
Average Call Holding Time	3.5 MOU
Intraswitch Traffic Flow	40%
Interswitch Traffic Flow	60%
Direct Trunked Traffic Flow	30% (50% of Interswitch Traffic Flow)
Tandem Trunked Traffic Flow	30% (50% of Interswitch Traffic Flow)
Local CNAM Queries (per Month)	10
Directory Assistance	
Total Calls	5
Calls from Above with Call Completion	2
Local CLASS Features	3

Toll Usage Profile

InterLATA MOU (Originating and Terminating)	40 MOU
InterLATA Interstate Usage	50%
IntraLATA MOU (Originating and Terminating)	20 MOU
Terminating to Originating Ratio	1
Average Call Holding Time	3.5 MOU
InterLATA Trunking	
Direct Trunking to IXC	75%
Tandem Trunking to IXC	25%
IntraLATA Trunking	
Direct Trunking	0%
Tandem Trunking	100%
Database Queries	
Simple 800	10
Complex 800	10
LIDB	10

Single Residential Line UNE Platform Cost for a Profile Customer

UNE Element	UNE Recurring PUD 960000218 Award	UNE Recurring SGAT	UNE NRC
2-Wire Analog Loop	$20.70	$20.70	$47.45
Local Switching - Analog Line Side Port	$3.00	$3.00	$80.50
Local Switching - Usage	$8.43	$14.90	NA
Common Transport	$0.34	$0.01	NA
Tandem Switching	$0.65	$0.05	NA
Signaling and Database Queries	$0.60	$0.60	NA
Directory Assistance	$1.81	$1.81	NA
Operator Services	$1.60	$1.60	NA
Service Order	NA	NA	$58.00
TOTAL	**$37.13**	**$42.67**	**$185.95**

Residential Single Line Customer Revenue/Platform Cost Analysis

	PUD 960000218 Interim Pricing Toll Excluded	SGAT Pricing Toll Excluded View	Toll Included View
Revenue			
Local[1]	$27.99	$27.99	$27.99
IntraLATA Toll[2]	0.00	0.00	2.20
InterLATA Access[3]	1.19	1.19	1.19
Total Revenue	**$29.18**	**$29.18**	**$31.38**
Cost of Goods (Platform)[4]	**$36.98**	**$42.52**	**$37.13**
Gross Margin	**($7.80)**	**($13.34)**	**($5.75)**
Gross Margin Percentage	**(26.73)**	**(45.72)**	**(18.32)**

UNE NRC = $185.95

Note: The Gross Margin calculated above must offset the UNE NRC cost in addition to Customer Service, Sales, General, and Administrative Costs.

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[1] The Local Revenue includes the monthly recurring charge for the line including the FCC subscriber line charge, features (Call Forwarding, Call Waiting, and 3-Way Calling), plus incidental revenue for operator services and directory assistance.

[2] IntraLATA Toll Revenue was calculated at 10 originating minutes at an average revenue per minute of $.022.

[3] InterLATA Access Revenue was calculated as the weighted average (based on the interLATA interstate usage percentage) of the interstate interLATA access rate and the intrastate interLATA access rate times the appropriate minutes of use

[4] SGAT, Appendix UNE, ¶ 12.10.2.C states that no ULS usage charges will apply on intraLATA Toll calls because SWBT is retaining this revenue source. The earlier UNE Platform Cost charts assumed AT&T would be paying for all element usage and therefore would be receiving the intraLATA revenue source. The primary elements this affects are unbundled local switching, tandem switching, and common transport. The cost for these three elements, if AT&T were to receive the intraLATA revenue, would be $0.15. Therefore, with SWBT excluding AT&T from intraLATA toll, the UNE Platform Cost has been reduced by this amount.

Profile 2

Local Usage Profile

Local Usage (Originating and Terminating)	1400 MOU
Terminating to Originating Ratio	1
Average Call Holding Time	3.5 MOU
Intraswitch Traffic Flow	40%
Interswitch Traffic Flow	60%
Direct Trunked Traffic Flow	30% (50% of Interswitch Traffic Flow)
Tandem Trunked Traffic Flow	30% (50% of Interswitch Traffic Flow)
Local CNAM Queries (per Month)	10
Directory Assistance	
Total Calls	5
Calls from Above with Call Completion	2
Local CLASS Features	3

Toll Usage Profile

InterLATA MOU (Originating and Terminating)	80 MOU
InterLATA Interstate Usage	50%
IntraLATA MOU (Originating and Terminating)	40 MOU
Terminating to Originating Ratio	1
Average Call Holding Time	3.5 MOU
InterLATA Trunking	
Direct Trunking to IXC	75%
Tandem Trunking to IXC	25%
IntraLATA Trunking	
Direct Trunking	0%
Tandem Trunking	100%
Database Queries	
Simple 800	10
Complex 800	10
LIDB	10

Single Residential Line UNE Platform Cost for a Profile Customer

UNE Element	UNE Recurring PUD 960000218 Award	UNE Recurring SGAT	UNE NRC
2-Wire Analog Loop	$20.70	$20.70	$47.45
Local Switching - Analog Line Side Port	$3.00	$3.00	$80.50
Local Switching - Usage	$8.78	$15.25	NA
Common Transport	$0.35	$0.02	NA
Tandem Switching	$0.71	$0.11	NA
Signaling and Database Queries	$0.60	$0.60	NA
Directory Assistance	$1.81	$1.81	NA
Operator Services	$1.60	$1.60	NA
Service Order	NA	NA	$58.00
TOTAL	**$37.55**	**$43.09**	**$185.95**

Residential Single Line Customer Revenue/Platform Cost Analysis

	PUD 960000218 Interim Pricing Toll Excluded	SGAT Pricing Toll Excluded View	Toll Included View
Revenue			
Local	$27.99	$27.99	$27.99
IntraLATA Toll[5]	0.00	0.00	4.40
InterLATA Access[6]	2.38	2.38	2.38
Total Revenue	**$30.37**	**$30.37**	**$34.77**
Cost of Goods (Platform)[7]	**$37.25**	**$42.79**	**$37.55**
Gross Margin	**($6.88)**	**($12.42)**	**($2.78)**
Gross Margin Percentage	**(22.65)**	**(40.90)**	**(8.00)**

UNE NRC = $185.95

Note: The Gross Margin calculated above must offset the UNE NRC cost in addition to Customer Service, Sales, General, and Administrative Costs.

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[5] IntraLATA Toll Revenue was calculated at 20 originating minutes at an average revenue per minute of $0.22.

[6] InterLATA Access Revenue was calculated as the weighted average (based on the interLATA interstate usage percentage) of the interstate interLATA access rate and the intrastate interLATA access rate times the appropriate minutes of use.

[7] SGAT, Appendix UNE, ¶ 12.10.2.C states that no ULS usage charges will apply on intraLATA Toll calls because SWBT is retaining this revenue source. The earlier UNE Platform Cost charts assumed AT&T would be paying for all element usage and therefore would be receiving the intraLATA revenue source. The primary elements this affects are unbundled local switching, tandem switching, and common transport. The cost for these three elements, if AT&T were to receive the intraLATA revenue, would be $0.30. Therefore, with SWBT excluding AT&T from intraLATA toll, the UNE Platform Cost has been reduced by this amount.

Profile 3

Local Usage Profile

Local Usage (Originating and Terminating)	1400 MOU
Terminating to Originating Ratio	1
Average Call Holding Time	3.5 MOU
Intraswitch Traffic Flow	40%
Interswitch Traffic Flow	60%
Direct Trunked Traffic Flow	30% (50% of Interswitch Traffic Flow)
Tandem Trunked Traffic Flow	30% (50% of Interswitch Traffic Flow)
Local CNAM Queries (per Month)	10
Directory Assistance	
Total Calls	5
Calls from Above with Call Completion	2
Local CLASS Features	3

Toll Usage Profile

InterLATA MOU (Originating and Terminating)	230 MOU
InterLATA Interstate Usage	50%
IntraLATA MOU (Originating and Terminating)	90 MOU
Terminating to Originating Ratio	1
Average Call Holding Time	3.5 MOU
InterLATA Trunking	
Direct Trunking to IXC	75%
Tandem Trunking to IXC	25%
IntraLATA Trunking	
Direct Trunking	0%
Tandem Trunking	100%
Database Queries	
Simple 800	10
Complex 800	10
LIDB	10

Single Residential Line UNE Platform Cost for a Profile Customer

UNE Element	UNE Recurring PUD 960000218 Award	UNE Recurring SGAT	UNE NRC
2-Wire Analog Loop	$20.70	$20.70	$47.45
Local Switching - Analog Line Side Port	$3.00	$3.00	$80.50
Local Switching - Usage	$9.93	$16.41	NA
Common Transport	$0.38	$0.05	NA
Tandem Switching	$0.89	$0.29	NA
Signaling and Database Queries	$0.61	$0.61	NA
Directory Assistance	$1.81	$1.81	NA
Operator Services	$1.60	$1.60	NA
Service Order	NA	NA	$58.00
TOTAL	**$38.92**	**$44.47**	**$185.95**

Residential Single Line Customer Revenue/Platform Cost Analysis

	PUD 960000218 Interim Pricing Toll Excluded	SGAT Pricing Toll Excluded View	Toll Included View
Revenue			
Local	$27.99	$27.99	$27.99
IntraLATA Toll[8]	0.00	0.00	9.90
InterLATA Access[9]	6.84	6.84	6.84
Total Revenue	**$34.83**	**$34.83**	**$44.73**
Cost of Goods (Platform)[10]	**$38.25**	**$43.80**	**$38.92**
Gross Margin	**($3.42)**	**($8.97)**	**$5.81**
Gross Margin Percntage	**(9.82)**	**(25.75)**	**12.99**

UNE NRC = $185.95
Note: The Gross margin calculated above must offset the UNE NRC cost in addition to Customer Service, Sales, General, and Administrative Costs

[8] IntraLATA Toll Revenue was calculated at 45 originating minutes at an average revenue per minute of $0.22.

[9] InterLATA Access Revenue was calculated as the weighted average (based on the interLATA interstate usage percentage) of the interstate interLATA access rate and the intrastate interLATA access rate times the appropriate minutes of use.

[10] SGAT, Appendix UNE, ¶ 12.10.2.C states that no ULS usage charges will apply on intraLATA Toll calls because SWBT is retaining this revenue source. The earlier UNE Platform Cost charts assumed AT&T would be paying for all element usage and therefore would be receiving the intraLATA revenue source. The primary elements this affects are unbundled local switching, tandem switching, and common transport. The cost for these three elements, if AT&T were to receive the intraLATA revenue, would be $0.67. Therefore, with SWBT excluding AT&T from intraLATA toll, the UNE Platform Cost has been reduced by this amount.

Profile 4

Local Usage Profile

Local Usage (Originating and Terminating)	1400 MOU
Terminating to Originating Ratio	1
Average Call Holding Time	3.5 MOU
Intraswitch Traffic Flow	40%
Interswitch Traffic Flow	60%
Direct Trunked Traffic Flow	30% (50% of Interswitch Traffic Flow)
Tandem Trunked Traffic Flow	30% (50% of Interswitch Traffic Flow)
Local CNAM Queries (per Month)	10
Directory Assistance	
Total Calls	5
Calls from Above with Call Completion	2
Local CLASS Features	3

Toll Usage Profile

InterLATA MOU (Originating and Terminating)	460 MOU
InterLATA Interstate Usage	50%
IntraLATA MOU (Originating and Terminating)	180 MOU
Terminating to Originating Ratio	1
Average Call Holding Time	3.5 MOU
InterLATA Trunking	
Direct Trunking to IXC	75%
Tandem Trunking to IXC	25%
IntraLATA Trunking	
Direct Trunking	0%
Tandem Trunking	100%
Database Queries	
Simple 800	10
Complex 800	10
LIDB	10